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Filing date: **06/24/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91195948
Party	Plaintiff Union Harbour Ltd.
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Submission	Motion to Consolidate
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Attachments	91195948 and 91214498 Motion to Consolidate.062414.pdf(70517 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Applicant: Lifung Trinity Management)
(Singapore) Pte. Ltd.)

Serial No.: 77/905,285)

Filing Date: January 5, 2010)

Opposition No. 91195948

Mark: K&C KENT & CURWEN)
(& Design)

Published: July 6, 2010)

Union Harbour, Ltd.,)

Opposer,)

v.)

Lifung Trinity Mmgt. (Singapore) Pte. Ltd.,)

Applicant)

Applicant: Union Harbour Limited)

Serial No.: 77/407,608)

Filing Date: February 27, 2008)

Mark:)



Published: July 26, 2013)

Opposition No. 91214498

LiFung Trinity Management (Singapore) Pte. Ltd.,)

Opposer,)

v.)

Union Harbour Limited)
)
Applicant)
)
_____)

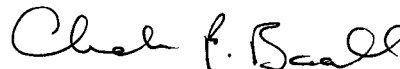
CONSENT MOTION TO CONSOLIDATE OPPOSITION NOS. 91195948 & 91214498

Union Harbour Ltd., the Opposer, in Opposition 91195948, moves that the more recently filed Opposition filed by LiFung Trinity Management (Singapore) Pte. Limited (“LiFung”) on January 13, 2014 against Union Harbour Ltd.’s Application for registration of the “GEORGE, GINA & LUCY (and design)” mark (Opp. No. 91214498) be consolidated with the first filed opposition filed by Union Harbour Ltd. on December 3, 2013 against LiFung’s trademark Application for “K&C KENT & CURWEN (and design)” (Opp. No. 91195948).

The grounds in support of this Motion are that both matters present common questions of law and fact involving priority of rights in, and the likelihood of confusion between, the common design element – “The Three Lions Element” – at issue in both marks. Both matters involve the same parties, and consolidation will save time, effort and expense. Neither party will be prejudiced or inconvenienced by the consolidation.

LiFung consents to this Motion. The parties ask that the Board reset dates for the consolidated proceeding by adopting the dates as set in the most recently instituted of the cases being consolidated, No. 91214498, as per TBMP Section 311.

Dated: June 24, 2014

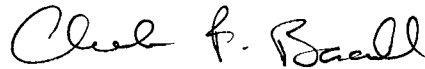


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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Motion to Consolidate has been served on Applicant on June 24, 2014 by mailing the true and complete copy via First Class Mail, postage prepaid, to:

Steven M. Rabin, Esq.
M. Scott Alprin, Esq.
Rabin & Berdo, P.C.
Suite 500, 1101 14th Street, NW
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A handwritten signature in cursive script, reading "Charles P. Bacall".

Charles P. Bacall
Attorney for Union Harbour, Ltd.